

USDC SDNY DOCUMENT ELECTRONICALLY FILED DOC #: DATE FILED: JUL 26 2013
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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

: INFORMATION

- v. -

: 13 Cr. ____

INGRID LEDERHAAS-OKUN,
a/k/a "Ingrid Okun,"

13 CRIM 560

Defendant.

COUNT ONE

(Interstate transportation of stolen property)

The United States Attorney charges:

1. From at least in or about July 2008, up to and including in or about June 2013, in the Southern District of New York and elsewhere, INGRID LEDERHAAS-OKUN, a/k/a "Ingrid Okun," the defendant, knowingly and willfully would and did transport, transmit, and transfer in interstate and foreign commerce goods, wares, merchandise, securities and moneys, of the value of \$5,000 and more, knowing the same to have been stolen, converted, and taken by fraud, to wit, LEDERHAAS-OKUN transported and/or caused to be transported jewelry that she had stolen from an international jewelry company based in midtown Manhattan (the "Jewelry Company"), where she was employed at the time, to her home in Connecticut.

(Title 18, United States Code, Section 2314.)

JUDGE GARDENHILL

FORFEITURE ALLEGATION

2. As a result of committing the offense charged, INGRID LEDERHAAS-OKUN, a/k/a "Ingrid Okun," the defendant, shall forfeit to the United States, pursuant to 18 U.S.C.

§ 981(a)(1)(C) and 28 U.S.C. § 2461, any property, real or personal, constituting, or derived from, proceeds traceable to such offense, including but not limited to the following:

a. Approximately \$2,114,873 in United States currency, in that such sum in aggregate is property representing the amount of proceeds obtained as a result of the offense; and

b. All right, title and interest of the defendant in any items seized from her residence at the time of her arrest on July 2, 2013 that are items that are or have been produced by or available for purchase from the Jewelry Company.

SUBSTITUTE ASSETS PROVISION

3. If any of the above-described forfeitable property, as a result of any act or omission of the defendant:

a. cannot be located upon the exercise of due diligence;

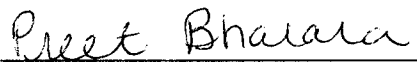
b. has been transferred or sold to, or deposited with, a third person;

c. has been placed beyond the jurisdiction of the Court;

d. has been substantially diminished in value; or

e. has been commingled with other property which cannot be subdivided without difficulty;
it is the intent of the United States, pursuant to 18 U.S.C. § 982(b)(1) and 21 U.S.C. § 853(p), to seek forfeiture of any other property of said defendant up to the value of the above forfeitable property.

(Title 18, United States Code, §§ 981(a)(1)(C) and 982(b)(1),
Title 21, United States Code, § 853(p), and
Title 28, United States Code, § 2461.)


PREET BHARARA
United States Attorney

Form No. USA-33s-274 (Ed. 9-25-58)

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18 U.S.C. §2314

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United States Attorney.
